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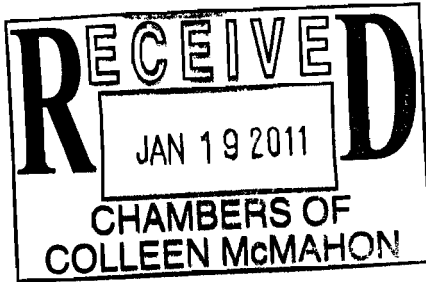
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January 18, 2011

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MEMO ENCLOSED

Via Federal Express

Hon. Colleen McMahon
United States District Judge
500 Pearl St., Room 640
Daniel Patrick Moynihan
United States Courthouse
New York, NY 10007

1/20/2011
[Handwritten signature]

Re: Shipco Transport Inc. v. JDB International, Inc., Docket No.: 09 Civ. 7532 (CM)

Dear Judge McMahon,

We represent Plaintiff Shipco Transport Inc. in the above matter. Please find enclosed a courtesy copy of a Stipulation and Proposed Order to extend time provided in the Scheduling Order for taking depositions.

The deposition dates were originally noticed for January 10 in compliance with the Scheduling Order but the dates needed to be changed to accommodate the schedules of the parties and deponents. Additional depositions were noticed for January 31, 2011. We have requested an extension of deposition time for 30 days through February 9, 2011 to permit taking depositions on dates satisfactory to the parties and deponents.

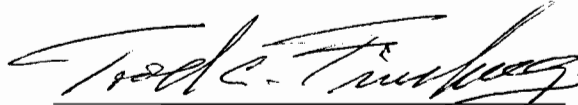
All parties to this action are agreed that any depositions taken by these parties, will be limited voluntarily to depositions that have already been noticed.

An extension of time for these depositions will not interfere with dates scheduled for disclosing or deposing experts or serving rebuttal expert reports as provided in the Scheduling Order as none have been disclosed. No other dates will be affected.

The Hon. Colleen McMahon
U.S District Court, New York
Shipco Transport v. JDB International, Inc.
January 18, 2011
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Thank you for your attention to this matter.

Regards.

A handwritten signature in black ink, appearing to read "Todd C. Fineberg", written over a horizontal line.

Todd C Fineberg, Esq. (TF 0980)

**RODRIGUEZ O'DONNELL
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